

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

William Degenhart, M.D.,)	Case No. 3:12-cv-458-CMC
)	
Plaintiff,)	
vs.)	<u>DEFENDANT CHICAGO TITLE</u>
)	<u>INSURANCE COMPANY'S</u>
Arthur State Bank and Chicago)	<u>RESPONSES TO LOCAL RULE</u>
Title Insurance Company,)	<u>26.01 INTERROGATORIES</u>
)	
Defendants.)	
<hr style="width: 30%; margin-left: 0;"/>)	

Defendant Chicago Title Insurance Company ("Chicago Title") provides the following responses to Local Rule 26.01 Interrogatories:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None known at this time.

B. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: Plaintiff has requested a jury trial in his Complaint on all causes of action.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Fidelity National Financial, which owns 100% of Chicago Title, is a publicly traded company. No other company owns 10% or more of Chicago Title's stock. Chicago Title is not a publicly owned company, nor does Chicago Title own shares of any other companies.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division):

RESPONSE: Chicago Title is informed and believes that Defendant Arthur State Bank is a resident of this division and Chicago Title does not challenge the appropriateness of the division in which this case is filed.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending:

RESPONSE: Chicago Title has no information regarding whether this action is related in whole or in part to any other matter filed in this District.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification:

RESPONSE: Chicago Title is properly identified.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in the matter, identify such person or entity and describe the basis of said liability.

RESPONSE: At this time, Chicago Title does not so contend.

Respectfully submitted,

s / Demetri K. Koutrakos

Demetri K. Koutrakos, Fed. ID #6989

Callison Tighe & Robinson, LLC

P. O. Box 1390

Columbia, SC 29202-1390

Telephone: 803-404-6900

Facsimile: 803-404-6902

ATTORNEYS FOR DEFENDANT

CHICAGO TITLE INSURANCE

COMPANY

May 25, 2012